

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

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JOSEFINA ROQUE AND PERLA  
LEDEZMA, INDIVIDUALLY, A/N/F  
SXXX RXXX, MINOR CHILD,  
Plaintiffs,

Cause No.

v.  
VICTORIA'S SECRET STORES, LLC,  
Defendant.

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**INDEX OF MATTERS FILED**

Defendant, pursuant to Local Rule 81(5), respectfully submits the following documents in connection with the removal of the above-styled and numbered action.

1. A copy of the Case Summary (docket) sheet for the case styled *Josefina Roque et al. v. Victoria's Secret Stores, LLC*, Cause No. 2021-DCL-00985-I, in the District court for the 445<sup>th</sup> Judicial District, Cameron County, Texas.
2. A copy of Plaintiff's Original Petition.
3. A copy of the executed process (return of service) on Victoria's Secret Stores, LLC.
4. A copy of Defendant's Original Answer.
5. List of counsel of record.

Respectfully submitted,

/s/ Christopher L. Kurzner

Christopher L. Kurzner  
State Bar No. 11769100  
Kurzner PC  
1700 Pacific Avenue, Suite 1870  
Dallas, Texas 75201  
Telephone: 214-442-0800  
Telecopier: 214-442-0850  
[ckurzner@kurzner.com](mailto:ckurzner@kurzner.com)

*Attorney for Defendant Victoria's Secret Stores,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the CM/ECF System for filing and transmittal to all counsel of record by U.S. Mail, postage prepaid, as follows:

Jorge A. Green  
Leticia Garza  
David M. Roerig  
THE GREEN LAW FIRM, P.C.  
34 S. Coria St.  
Brownsville, Texas 78520.

*/s/ Christopher L. Kurzner*

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Christopher L. Kurzner

445TH DISTRICT COURT

# CASE SUMMARY

## CASE NO. 2021-DCL-00985

**Josefina Roque, Perla Ledezma vs. Victoria's Secret Stores, LLC**

§  
§  
§  
§

Location: **445th District Court**  
Judicial Officer: **Rincones, Gloria M**  
Filed on: **02/18/2021**

### CASE INFORMATION

Case Type: **Other Injury or Damage**

### DATE

### CASE ASSIGNMENT

#### Current Case Assignment

Case Number 2021-DCL-00985  
Court 445th District Court  
Date Assigned 02/18/2021  
Judicial Officer Rincones, Gloria M






### PARTY INFORMATION

<b>Plaintiff</b>	<b>Ledezma, Perla</b>  <b>Roque, Josefina</b>	<i>Lead Attorneys</i> <b>GREEN, JORGE A.</b> <i>Retained</i> (956)542-7000(W)  <b>GREEN, JORGE A.</b> <i>Retained</i> (956)542-7000(W)
<b>Defendant</b>	<b>Victoria's Secret Stores, LLC</b>	<b>KURZNER, CHRISTOPHER LOUIS</b> <i>Retained</i> 214-442-0801(W)

### DATE

### EVENTS & ORDERS OF THE COURT

### INDEX

02/18/2021	Original Petition (OCA) <i>Plaintiff's Original Petition</i>	
02/18/2021	 Efiled Original Petition Document <i>Plaintiff Original Petition</i>	
02/22/2021	 Citation Issued Party: Defendant Victoria's Secret Stores, LLC <i>citation emailed to V'Serna@thegreenlawfirm.com, CCH</i>	
02/22/2021	<b>Citation</b> Victoria's Secret Stores, LLC	served 02/23/2021
03/03/2021	 Service Return <i>Citation &amp; Affidavit of Service</i>	
03/19/2021	 Original Answer Party: Defendant Victoria's Secret Stores, LLC <i>Original Answer on Defendant Victoria Secret Stores, LLC</i>	
03/23/2021	 Motion	

**CASE SUMMARY**  
**CASE NO. 2021-DCL-00985**

*Plaintiff's Motion for Trial Setting*

03/23/2021



E-Filed Order

*Order Setting Hearing (Q)*

DATE	FINANCIAL INFORMATION
<b>Plaintiff</b> Roque, Josefina	
Total Charges	315.00
Total Payments and Credits	315.00
<b>Balance Due as of 3/25/2021</b>	<b>0.00</b>

CAUSE NO. 2021-DCL-00985

JOSEFINA ROQUE AND PERLA	§	IN THE DISTRICT COURT
LEDEZMA, INDIVIDUALLY, A/N/F	§	
SXXX RXXX, MINOR CHILD	§	Cameron County - 445th District Court
PLAINTIFFS,	§	
	§	
VS.	§	_____ JUDICIAL DISTRICT
	§	
VICTORIA'S SECRET STORES, LLC	§	
DEFENDANT	§	CAMERON COUNTY, TEXAS

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**PLAINTIFFS' ORIGINAL PETITION**

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To The Honorable Judge of This Court:

*Come Now* Plaintiffs, Josefina Roque and Perla Ledezma, Individually, an as Next Friend of SXXX RXXX, complaining of Defendant Victoria's Secret Stores, LLC, and for causes of action file this Plaintiffs Original Petition. In support, Plaintiff would respectfully show the Court the following:

**A. TRCP 47 Disclosure and Discovery Control Plan**

1.1 Plaintiffs seek monetary relief of \$250,000.00 or less. *Tex.R.Civ.P. 47*. More specifically, Plaintiffs seek monetary relief not to exceed \$75,000.00.

1.2 Plaintiffs intend to conduct discovery under Level 1 of the *Tex. R. Civ. P.*, as provided for in *Tex. R. Civ. P. 169* for expedited actions.

**B. Parties and Service**

2.1 Plaintiffs are individuals residing in Los Fresnos, Cameron County, Texas.

2.2 Defendant Victoria's Secret Stores, LLC is a foreign corporation registered with the Texas Secretary of State to do business in Texas. Defendant may be served with

process by serving its registered agent, CT Corporation System at 1999 Bryan St., Suite 900, Dallas, Texas 75201. Plaintiffs request citation at this time and will serve Defendant through a private civil process server.

### **C. Venue and Jurisdiction**

3.1 This Court has subject matter jurisdiction over this action because Plaintiffs seek unliquidated damages in an amount within this Court's jurisdictional limits.

3.2 Venue is proper in Cameron County, Texas, under Texas Civil Practice and Remedies Code §15.002(a)(1) because all or a substantial part of the events or omissions giving rise to Plaintiffs' cause of action occurred in Brownsville, Cameron County, Texas.

### **D. Facts**

6. On or about November 17, 2019, Plaintiffs suffered injuries when they slipped and fell on lotion that was on the floor of the Victoria's Secret Store located inside the Sunrise Mall in Brownsville, Texas.

### **E. Causes of Action**

#### **Count One - Premises Liability**

7. At all times material hereto, Defendant was the owner and/or possessor and/or operator of Victoria's Secret Store where Plaintiffs' incident occurred.

8. Defendant, its agents and its employees knew or should have known of the unreasonably dangerous condition. Despite such knowledge, Defendant and its agents and employees, negligently failed to warn Plaintiffs of the condition at the premises, or to otherwise make the premises safe. This condition existed despite the fact that Defendant,

its agents, and employees knew or should have known of the existence of the condition and that there was likelihood of a person being injured, as occurred to Plaintiffs.

9. At all times relevant, Defendant, and its agents, servants, and employees who were acting in the scope of their employment, were guilty of negligent conduct toward Plaintiff in:

- a) Failing to maintain the premises in reasonably safe condition;
- b) Failing to give adequate and understandable warnings to Plaintiffs regarding the unsafe condition of the premises;

10. Plaintiffs were invitees on the premises at the time of their injuries and other damages. At the time of the injury (1) a condition of the premises created an unreasonable risk of harm to the invitee; (2) the owner and/or possessor and/or operator knew or reasonably should have known of the condition; (3) owner and/or possessor and/or operator failed to exercise ordinary care to protect the invitee from danger; and (4) owner's and/or possessor's and/or operator's failure was a proximate cause of the injury to the invitee

#### Prayer

15. *Wherefore, premises considered,* Plaintiffs respectfully pray that Defendant be cited to appear and answer, and that they ultimately have judgment against Defendant for the following:

- a. Physical pain in the past and future;
- b. Mental anguish in the past and future;
- c. Physical impairment in the past and future;

- d. Physical disfigurement in the past and future;
- e. Medical expenses in the past and future;
- f. Costs of suit;
- g. Pre-judgment and post-judgment interest; and
- h. All other relief, in law and in equity, to which Plaintiffs may be entitled.

Respectfully submitted,

**THE GREEN LAW FIRM, P.C.**  
34 S. Coria St.  
Brownsville, Texas 78520  
(956) 542-7000 Tel.  
(956) 542-7026 Fax

By: /s/ Jorge A. Green

JORGE A. GREEN  
State Bar No. 24038023  
[jorge@thegreenlawfirm.com](mailto:jorge@thegreenlawfirm.com)  
LETICIA GARZA  
State Bar No. 24092405  
[lety@thegreenlawfirm.com](mailto:lety@thegreenlawfirm.com)  
DAVID M. ROERIG  
State Bar No. 24060513  
[david@thegreenlawfirm.com](mailto:david@thegreenlawfirm.com)

**ATTORNEYS FOR PLAINTIFFS**



## CITATION – PERSONAL SERVICE – TRCP 99

## THE STATE OF TEXAS

2021-DCL-00985-I

Josefina Roque § IN THE 445TH DISTRICT COURT  
VS § OF  
Victoria's Secret Stores, LLC § CAMERON COUNTY, TEXAS

TO **Victoria's Secret Stores, LLC**  
**Registered Agent CT Corporation System**  
**1999 Bryan St Suite 900**  
**Dallas TX 75201**

**NOTICE TO DEFENDANT:** "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](http://TexasLawHelp.org)." TRCP. 99

You are hereby commanded to appear by filing a written answer to **Plaintiff Original Petition** at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the Honorable 445th District Court of Cameron County, at the Courthouse in said County in Brownsville, Texas. Said **Plaintiff Original Petition** was filed in said court on **February 18, 2021**, in the above entitled cause.

2021-DCL-00985-I

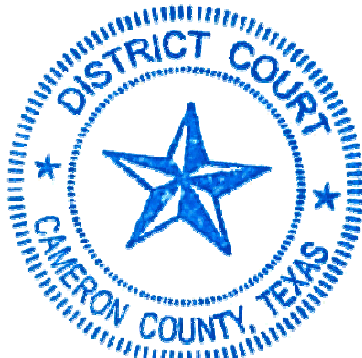
Josefina Roque, Perla Ledezma, SXXX RXXX vs.  
Victoria's Secret Stores, LLC

The nature of Petitioner's demand is fully shown by a true and correct copy of **Plaintiff Original Petition** accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

Issued and given under my hand and seal of said Court at Brownsville, Texas, on this the 22nd day of February, 2021.

ATTORNEY:  
**JORGE A. GREEN**  
**24038023**  
**(956) 542-7000**  
**34 S Coria St**  
**Brownsville TX 78520**



**Laura Perez-Reyes**  
District Clerk of Cameron County  
974 E Harrison St.  
Brownsville, Texas 78520

Signed: 2/22/2021 9:29:26 AM

By: Christina E. Chavez  
**Christina Chavez, Deputy Clerk**

**\*\*AFFIDAVIT OF SERVICE ATTACHED\*\***

**2021-DCL-00985-I**  
**445th District Court**

**Josefina Roque, Perla Ledezma, SXXX RXXX vs.**  
**Victoria's Secret Stores, LLC**

### RETURN OF SERVICE

Executed when copy is delivered:

This is a true copy of the original citation, was delivered to defendant \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

NAME/ADDRESS FOR SERVICE

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_ Officer  
 \_\_\_\_\_ County, TX

By: \_\_\_\_\_ Deputy

### OFFICERS RETURN

Came to hand on the \_\_\_\_ day of \_\_\_\_\_, at \_\_\_\_ o'clock \_\_\_\_ m and \_\_\_\_\_ County, Texas, by delivering to each of the within named defendants in person, a true copy of this \_\_\_\_\_ with the date of delivery endorsed thereon, together with the accompanying copy of the \_\_\_\_\_ at the following times and places, to wit:

NAME	DATE/TIME	PLACE/COURSE/DISTANCE FROM COURTHOUSE

And not executed as to the defendant(s), \_\_\_\_\_  
 The diligence used in finding said defendant(s) being:

\_\_\_\_\_ and the cause or failure to execute this process is:

\_\_\_\_\_ and the information received as to the whereabouts of said defendant(s) being:

FEES:

SERVING PETITION/COPY \$ \_\_\_\_\_

TOTAL: \$ \_\_\_\_\_

\_\_\_\_\_  
 \_\_\_\_\_ Officer  
 \_\_\_\_\_ County, TX

By: \_\_\_\_\_ Deputy

\_\_\_\_\_  
 AFFIANT

### COMPLETE IF YOU ARE A PERSON OTHER THAN A SHERIFF, CONSTABLE, OR CLERK OF THE COURT.

In accordance with Rule 107: The officer or authorized person who serves, or attempts to serve, a citation shall sign the return. The signature is not required to be verified. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return shall be signed under penalty or perjury and contain the following statement:

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_, my address is \_\_\_\_\_

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED in \_\_\_\_\_ County, State of \_\_\_\_\_, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
 ID Number/Expiration of Certification

\_\_\_\_\_  
 Declarant/Authorized Process Server

**\*\*AFFIDAVIT OF SERVICE ATTACHED\*\***

**AFFIDAVIT OF SERVICE**

CAUSE NO: 2021-DCL-00985-!

JOSEFINA ROQUE,  
Plaintiff,

IN THE DISTRICT COURT

Vs.

445<sup>TH</sup> JUDICIAL DISTRICT

VICTORIA'S SECRET STORES, LLC,  
Defendant,

CAMERON COUNTY, TEXAS

Documents: CITATION AND PLAINTIFF'S ORIGINAL PETITION

I, Gean O. Smith, received the above documents on: FEBRUARY 22, 2021 at 5:00 P.M. to be delivered to:

VICTORIA'S SECRET STORES, LLC  
REGISTERED AGENT, CT CORPORATION SYSTEM  
1999 BRYAN STREET, SUITE 900  
DALLAS, TEXAS 75201

I, GEAN O. SMITH, the undersigned, being duly sworn, depose and say, that I am duly authorized under Rule 103 and 536(a) to make delivery of the document(s) listed herein in the above styled case. I am over the age of 18, and am not a party to or otherwise interested in this matter. Delivery of said documents occurred in the following manner:

By delivering to: VICTORIA'S SECRET STORES, LLC., BY AND THROUGH TERRI THONGSAVAT (white female, age 38, 5'6" tall, 150 lbs, brown hair)

(Title / Relationship): INTAKE ASSOCIATE FOR REGISTERED AGENT, CT CORPORATION SYSTEM

Address of Service: 1999 BRYAN STREET, SUITE 900, DALLAS, TEXAS 75201, (DALLAS COUNTY, TEXAS)

Date of Service: FEBRUARY 23, 2021 Time of Service: 10:55 A.M.

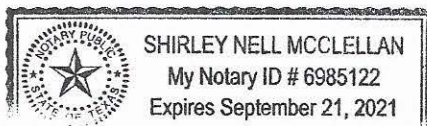
Type of Service:

- ☐ **PERSONAL SERVICE:** Individually and personally to the above named recipient.
- ☐ **SUBSTITUTE SERVICE:** By leaving a true copy of said process with a person therein, who is of suitable age, at the above listed address, which is the usual place of abode or dwelling house of the above named person.
- ☒ **CORPORATION / PARTNERSHIP:** By delivering a true copy of said process to an officer, registered agent, partner or anyone available to accept service for the above named entity whose name and title is listed above.
- ☐ **POSTING WITH COURT ORDER:** By posting a true copy of said process along with a true copy of the Court Order with the date of service endorsed thereon by me, to the front entrance of the above listed address of service, which is the usual place of abode or dwelling house of the above named person, in compliance with state statutes and per Rule 106 Order.
- ☐

"I declare under penalties of perjury that the information contained herein is true and correct"

Signature  
GEAN O. SMITH  
Authorized Person

PSC# 4683  
Exp: 01/31/2022



Subscribed and sworn to before me, a notary public on FEBRUARY 27, 2021

A handwritten signature of Shirley Nell McClellan, the Notary Public, written in black ink.

Notary Public in and of the State of Texas

**Cause No. 2021-DCL-00985****JOSEFINA ROQUE AND PERLA LEDEZMA,  
INDIVIDUALLY & a/n/f SXXX RXXX,  
MINOR CHILD,****Plaintiffs,****v.****VICTORIA'S SECRET STORES, LLC,****Defendant.**§ **IN THE DISTRICT COURT**  
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§ **CAMERON COUNTY, TEXAS**  
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§ **445<sup>th</sup> JUDICIAL DISTRICT****ORIGINAL ANSWER OF DEFENDANT**  
**VICTORIA'S SECRET STORES, LLC**

Defendant Victoria's Secret Stores, LLC ("Defendant" or "VSS") through the undersigned counsel, answers Plaintiffs' Original Petition:

**I. GENERAL DENIAL**

Pursuant to Tex. R. Civ. P. 92, Defendant denies generally each and all of the allegations contained in Plaintiffs' Original Petition, demands strict proof thereof by preponderance of the evidence, and of this general denial prays judgment of the Court.

**II. AFFIRMATIVE DEFENSES**

1. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that Plaintiffs purported damages, if any, are barred or limited in whole or in part by Plaintiffs' own negligence pursuant to the provisions of Chapter 33, Tex. Civ. Prac. & Rem. Code.

2. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense to the extent such pleading may be necessary, Defendant hereby requests that the relative damages and conduct of all parties and all tortfeasors, including

Plaintiffs, Defendant, and any designated responsible third parties be considered, and that Defendant be accorded the full benefit of Chapter 33, Tex. Civ. Prac. & Rem. Code, including proportionate responsibility and contribution.

3. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that the injuries/damages, if any, allegedly suffered by Plaintiffs were directly and proximately caused in whole or part by Plaintiffs' own negligence and/or negligence per se, which negligence and/or negligence per se was greater than any negligence of Defendant, and thus any recovery by Plaintiffs is barred.

4. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that Plaintiffs' purported damages, if any, were caused in whole or in part by third parties or forces over whom Defendant had no control.

5. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that Plaintiffs failed to mitigate their damages by not using ordinary care to reduce or avoid their damages, and that such failure to mitigate resulted in additional and unnecessary damages.

6. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that Plaintiffs assumed the risk of the activities in which Plaintiffs were engaged and therefore, Plaintiffs cannot recover from Defendant.

7. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense to the extent such pleading may be necessary, Defendant hereby asserts that Plaintiffs' claims are barred or limited by the doctrine of equitable or judicial estoppel.

8. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense to the extent such pleading may be necessary, Defendant had no notice, actual or constructive, as to the alleged condition that Plaintiffs have alleged caused them to suffer injuries and damages.

9. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that Plaintiffs' claims are barred by the open and obvious doctrine.

10. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense to the extent such pleading may be necessary, Plaintiffs' "right" to recover billed medical expenses is limited by the provisions of Tex. Civ. Prac. & Rem. Code § 41.0105 to the amount actually paid or incurred by or on behalf of the Plaintiffs.

11. Subject to and without waiving the foregoing General Denial and by way of a separate or affirmative defense, Defendant alleges that if Plaintiffs are suffering from any physical or mental condition or disability at the present time, or after the incident made the basis of this suit, that such condition or disability was solely caused by accidents, injuries, diseases, or disorders that were preexisting or that arose subsequent to the time of the alleged incident made the basis of this suit and are wholly unconnected with the incident made the basis of this suit, or that such conditions or disabilities were partially caused by such preexisting or subsequent accidents.

12. To the extent Plaintiffs seek damages for any alleged disability or incapacity as a result of the incident made the basis of this suit, then the disability or incapacity is temporary only and not permanent, and partial only and not total, and that Plaintiffs' earning capacity have



not been reduced or impaired as a result of the alleged injury and/or any disability or incapacity resulting therefrom.

13. To the extent Plaintiffs seek damages for alleged loss of earnings, loss of earning capacity, loss of contributions of a pecuniary value, or loss of inheritance, Plaintiffs must under Texas Civil Practice and Remedies Code, Section 18.091 present such evidence to prove such loss in the form of a net loss after reduction for income tax payments or unpaid tax liability pursuant to any federal income tax law. The Court is also required to, and Defendant specifically requests the Court to, instruct the jury (if a jury is demanded) that such damages sought by Plaintiff are subject to federal or state income taxes.

14. Any award of pre-judgment or post-judgment interest is limited by Texas Civil Practice and Remedies Code, Section 41.007 and the Texas Finance code generally.

15. In the unlikely event Plaintiffs obtain a damage finding against Defendant on multiple causes of action against it, Plaintiffs are prohibited from obtaining a double recovery and must make an election.

### **III. NOTICE OF INTENT TO USE PRODUCED MATERIALS**

16. Defendant gives notice to all parties that any and all documents produced during discovery may be offered against the producing party at any pre-trial proceeding and/or trial of this case, unless objections based on authenticity are timely made. This notice is given pursuant to Rule 193.7 of the Texas Rules of Civil Procedure.

WHEREFORE, Defendant respectfully requests that upon final trial and hearing, the Court enter judgment that Plaintiffs take nothing by reason of their claims, that Defendant be discharged and recover its costs and such other and further relief, both at law and in equity, to which Defendant may be justly entitled.

Respectfully submitted,

KURZNER PC

By: /s/ Christopher L. Kurzner  
Christopher L. Kurzner  
State Bar No. 11769100  
1700 Pacific Avenue, Suite 1870  
Dallas, Texas 75201  
Telephone: 214-442-0800  
Telecopier: 214-442-0850  
[ckurzner@kurzner.com](mailto:ckurzner@kurzner.com)

COUNSEL FOR DEFENDANT  
VICTORIA'S SECRET STORES, LLC.

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing instrument to be served on Plaintiff via the Court's electronic case filing system or as may be otherwise provided under the Texas Rules of Civil Procedure on this the 19<sup>th</sup> day of March, 2021.

/s/ Christopher L. Kurzner



**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

---

JOSEFINA ROQUE AND PERLA  
LEDEZMA, INDIVIDUALLY, A/N/F  
SXXX RXXX, MINOR CHILD,  
Plaintiffs,

v.  
VICTORIA'S SECRET STORES, LLC,  
Defendant.

---

**LIST OF COUNSEL OF RECORD**

Defendant, pursuant to Local Rule 81(6), respectfully submits the following list of  
counsel of record.

Jorge A. Green  
Leticia Garza  
David M. Roerig  
THE GREEN LAW FIRM, P.C.  
34 S. Coria St.  
Brownsville, Texas 78520  
(956) 542-7000 Tel.  
(956) 542-7026 Fax

Counsel for Plaintiffs

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Counsel for Defendant

Respectfully submitted,

/s/ Christopher L. Kurzner  
Christopher L. Kurzner  
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Dallas, Texas 75201  
Telephone: 214-442-0800  
Telecopier: 214-442-0850  
[ckurzner@kurzner.com](mailto:ckurzner@kurzner.com)

*Attorney for Defendant Victoria's Secret Stores,  
LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2021, I electronically transmitted the foregoing document to the Clerk of the Court using the CM/ECF System for filing and transmittal to all counsel of record by U.S. Mail, postage prepaid, as follows:

Jorge A. Green  
Leticia Garza  
David M. Roerig  
THE GREEN LAW FIRM, P.C.  
34 S. Coria St.  
Brownsville, Texas 78520.

*/s/ Christopher L. Kurzner*

---

Christopher L. Kurzner